NEW SOURCE CONSTRUCTION PERMIT
and
MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

Flutes, LLC
8252 Zionsville Road
Indianapolis, IN 46268

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-12706-00347	
Issued by: Vaneeta M. Kumar Administrator, ERMD City of Indianapolis	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and ERMD. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary manufacturer of corrugated sheets.

Authorized Individual:	John Alabaugh
Source Address:	8252 Zionsville Road, Indianapolis, In. 46268
Mailing Address:	8252 Zionsville Road, Indianapolis, In. 46268
Phone Number:	317-870-6010
SIC Code:	2679
County Location:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD or Emission Offset Rules;

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) One Bobst/Air Equipment and Engineering MF250/MPC3 Asitrade Line/Scrap collector for the manufacturing of corrugated sheets (Emission Unit #2), with a maximum production rate of 14,137 lbs/hr, constructed in January 1999. This unit and Emission Unit #3 are controlled by a Cyclone (CE1) as primary control for particulate emissions and a Baghouse (CE2) as secondary control for particulate emissions. The baghouse discharges inside of the building

(b) One Bobst/Air Equipment and Engineering MF250/MPC3 Asitrade Line/Scrap collector for the manufacturing of corrugated sheets (Emission ID#3), with a maximum production rate of 14,137 lbs/hr, constructed in May 2000. This unit and Emission Unit #2 are controlled by a Cyclone (CE1) as primary control for particulate emissions and a Baghouse (CE2) as secondary control for particulate emissions. The baghouse discharges inside of the building.

(c) One natural gas fired Superior 508 boiler (Emission Unit #1), constructed in January 1999, with a maximum heat input capacity of 3.348 MMBtu/hr. This unit has no controls and is vented to stack 01.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Minor Source Operating Permit Renewal [326 IAC 2-6.1-7]

Pursuant to 326 IAC 2-6.1-7, an operating permit shall be valid for a period of time not to exceed five (5) years. However, permits may be valid for any lesser period if determined necessary for administrative reasons by IDEM, OAQ, or ERMD. At least ninety (90) calendar days prior to the expiration date of an operating permit, the applicant shall apply for a new operating permit from ERMD. If a timely and sufficient application for renewal has been made, the existing permit does not expire until a final decision on the application for renewal has been made by the department. The application for the operating permit renewal shall include the following information:

(a) Certification that the source has not changed from the initial permit issuance or that all modifications to the source have been reviewed and approved in accordance with this rule.

(b) Identification of any changes to the source that are subject to this article that have not received approval prior to construction or operation.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of each criteria air pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ and ERMD prior to making the change.

(c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ and ERMD prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, and ERMD upon request and shall be subject to review and approval by IDEM, OAQ, and ERMD. IDEM, OAQ, and ERMD may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, ERMD, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and ERMD, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, and ERMD shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the

"authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM and ERMD, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity) monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved

by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ, and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and ERMD if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being

implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.15 Malfunctions Report [326 IAC 1-6-2]
Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down

or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or

contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

(a) One Bobst/Air Equipment and Engineering MF250/MPC3 Asitrade Line/Scrap collector for the manufacturing of corrugated sheets (Emission Unit #2) with a maximum production rate of 14,137 lbs/hr, constructed in January 1999. This unit and Emission Unit #3 are controlled by a Cyclone (CE1) as primary control for particulate emissions and a Baghouse (CE2) as secondary control for particulate emissions. The baghouse discharges inside of the building.

(b) One Bobst/Air Equipment and Engineering MF250/MPC3 Asitrade Line/Scrap collector for the manufacturing of corrugated sheets (Emission ID#3) with a maximum production rate of 14,137 lbs/hr, constructed in May 2000. This unit and Emission Unit #2 are controlled by a Cyclone (CE1) as primary control for particulate emissions and a Baghouse (CE2) as secondary control for particulate emissions. The baghouse discharges inside of the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from The Asitrade Line/ Scrap Collectors (EU2 and EU3) shall be limited to 0.03 grain per dry standard cubic foot of exhaust. At a maximum air flow rate of 12,453 actual cubic feet per minute, this is equivalent to 3.20 pounds of particulate matter (PM) emissions per hour.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C.2 Preventive Maintenance Plan, of this permit, is required for EU2 and EU3.

Compliance Determination Requirements

D.1.3 Particulate Matter (PM)

In order to comply with D.1.1 the baghouse shall be in operation and control emissions from the scrap collectors at all times that either scrap collector (EU-2 or EU3) is in operation.

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emission units (EU2 and EU3) by this permit. However, IDEM and ERMD may require compliance testing when necessary to determine if the emissions units are in compliance. If testing is required by IDEM or ERMD, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C.9 - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-6.1-2][326 IAC 2-6.1-5(a)(2)]

D.1.5 Visible Emissions Notations

(a) Visible emission notations of the CE-2 vent exhausts once per shift shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Baghouse Parameter Monitoring

The Permittee shall record the total static pressure drop across the baghouse CE-2 used in conjunction with emissions units EU2 and EU3 at least once shift when the process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse CE-2 shall be maintained within the range of 1.5 and 8 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The gauge employed to measure the pressure drop across the baghouse or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm$ 2% of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

D.1.7 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling EU2 and EU3 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the vent exhaust from CE-1 whenever emissions are being directed outside of the building.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

(c) One natural gas fired Superior 508 boiler (Emission Unit #1), constructed in January 1999, with a maximum heat input capacity of 3.348 MMBtu/hr. This unit has no controls and is vented to stack 01.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter (PM) emissions shall be limited to 0.6 pounds per million BTU heat input, which is equivalent to 8.79 ton/yr.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-1.1-11]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the Particulate Matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C.10 - Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
AND ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION (ERMD)
CITY OF INDIANAPOLIS

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Flutes, LLC**
Address:	**8252 Zionsville Road**
City:	**Indianapolis, IN 46268**
Phone #:	**317-870-6010**
MSOP #:	**097-12706-00347**

I hereby certify that Flutes, LLC is: **9** still in operation.
9 no longer in operation.

I hereby certify that Flutes, LLC is:**9** in compliance with the requirements of MSOP 097-12706-00347
9 not in compliance with the requirements of MSOP 097-12706-00347

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND
REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:
_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

PAGE 1 OF 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____
_____

PAGE 2 OF 2

Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Environmental Resources Management Division

Addendum to the
Technical Support Document for MSOP

Source Name:	**Flutes, LLC**
Source Location:	**8252 Zionsville Road, Indianapolis, IN 46268**
County:	**Marion**
SIC Code:	**2679**
Operation Permit No.:	**097-12706-00347**
Permit Reviewer:	**Dana Armstrong**

On July 20, 2001, the Office of Air Quality (OAQ) and ERMD had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Flutes LLC had applied for a MSOP to operate a stationary manufacturer of corrugated sheets. The notice also stated that OAQ and ERMD proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAQ and ERMD has made the following changes to the final MSOP (changes are bolded for emphasis):

The D.1 Facility Description box was changed as follows:

Facility Description:

(a) One Bobst/Air Equipment and Engineering MF250/MPC3 Asitrade Line/Scrap collector for the manufacturing of corrugated sheets (Emission Unit #2)~~, constructed in 1999,~~ with a maximum production rate of 14,137 lbs/hr, constructed in January 1999. This unit and Emission Unit #3 are controlled by a Cyclone (CE1) as primary control for particulate emissions and a Baghouse (CE2) as secondary control for particulate emissions. The baghouse discharges inside of the building**.**

(b) One Bobst/Air Equipment and Engineering MF250/MPC3 Asitrade Line/Scrap collector for the manufacturing of corrugated sheets (Emission ID#3)~~, constructed in 2000,~~ with a maximum production rate of 14,137 lbs/hr, constructed in May 2000. This unit and Emission Unit #2 are controlled by a Cyclone (CE1) as primary control for particulate emissions and a Baghouse (CE2) as secondary control for particulate emissions. The baghouse discharges inside of the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Section D.1.3 was changed as follows:

D.1.3 Particulate Matter (PM)

~~i~~**I**n order to comply with D.1.1 the baghouse shall be in operation and control emissions from the scrap collectors at all times that either scrap collector (EU-2 or EU3) is in operation.

Section D.1.4 was changed as follows:

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emission units (EU2 and EU3) by this permit. However, IDEM and ERMD may require compliance testing when necessary to determine if the emissions unit**s** ~~is~~ **are** in compliance. If testing is required by IDEM or ERMD, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C.9 - Performance Testing**.**

Indiana Department of Environmental Management
Office of Air Quality
And City of Indianapolis Environmental Resources Management Division

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	**Flutes, LLC**
Source Location:	**8252 Zionsville Road, Indianapolis, IN 46268**
County:	**Marion**
SIC Code:	**2679**
Operation Permit No.:	**097-12706-00347**
Permit Reviewer:	**Dana Armstrong**

The Office of Air Quality (OAQ) has reviewed an application from Flutes LLC relating to the construction and operation of a stationary manufacturer of corrugated sheets.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One Bobst/Air Equipment and Engineering MF250/MPC3 Asitrade Line/Scrap collector for the manufacturing of corrugated sheets (Emission Unit #2), with a maximum production rate of 14,137 lbs/hr, constructed in January 1999. This unit and Emission Unit #3 are controlled by a Cyclone (CE1) as primary control for particulate emissions and a Baghouse (CE2) as secondary control for particulate emissions. The baghouse discharges inside of the building

(b) One natural gas fired Superior 508 boiler (Emission Unit #1), constructed in January 1999, with a maximum heat input capacity of 3.348 MMBtu/hr. This unit has no controls and is vented to stack 01.

Unpermitted Emission Units and Pollution Control Equipment

(a) One Bobst/Air Equipment and Engineering MF250/MPC3 Asitrade Line/Scrap collector for the manufacturing of corrugated sheets (Emission ID#3), with a maximum production rate of 14,137 lbs/hr, constructed in May 2000. This unit and Emission Unit #2 are controlled by a Cyclone (CE1) as primary control for particulate emissions and a Baghouse (CE2) as secondary control for particulate emissions. The baghouse discharges inside of the building.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

CP0990347-01issued on August 5th, 1999.

All conditions from previous approvals were incorporated into this permit except the following:

CP-0990347-01, issued on August 5th, 1999
Condition 12 (Potential to Emit Limitations)

"Pursuant to section 511 Permit Fees, potential emissions have been limited to 19.0 tons per year such that 511 (c)(1)(d) will not apply. Compliance with 19.0 tons per year is equivalent to a throughput of 65,700 tons of production and 3,800 tons of scrap per 12 consecutive months. A log of information shall be kept at the source for a 36 month period in a format approvable by the Environmental Resources Management Division (ERMD)."

Reason not incorporated: This requirement was incorporated for billing purposes and is not federally enforceable under Part 70 rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
01	Boiler	38	1.32	800	350

There is no stack vent information for the Scrap Collectors, as indicated in the application.

Enforcement Issue

(a) IDEM and ERMD are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM and ERMD are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 12, 2000, with additional information received on December 20, 2000.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided on page 4 of 4 of Appendix A of this document.

Potential To Emit of the Entire Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	52.76
PM-10	0.20
SO_2	0.008
VOC	0.07
CO	1.23
NO_x	1.46

HAP's	Potential To Emit (tons/year)
Formaldehyde	0.66
Total	0.66

(a) Potential emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year but less than 100 tons per year. Therefore, pursuant to 326 IAC 2-5.1-4, a minor source operating permit will be issued.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit of the Entire Source

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
EU1	0.20	0.20	0.008	0.08	1.23	1.47	
EU2	26.28	0.20		8.72			0.33
EU3	26.28	0.20		8.72			0.33
Total Emissions	52.76	0.60	0.008	17.52	1.23	1.47	0.66

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	maintenance
NO_x	maintenance
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)
This existing source total PTE summarized in this TSD is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plans)
This source is subject to 326 IAC 1-6-3 because it is required to obtain a Permit. Any person responsible for operating any facility required to obtain a Permit shall prepare and maintain a Preventive Maintenance Plan which includes the following:

1) Identification of responsible individuals for inspecting, maintaining and repairing emission control devices.

2) Description of items and conditions that will be inspected and an inspection schedule.

3) Identification of replacement parts in inventory for quick replacement.

The Preventive Maintenance Plan shall be submitted upon request and subject to review and approval by ERMD.

326 IAC 2-4.1 (New Source Toxics Control)
The source is not subject to 326 IAC 2-4.1 since it is not a major source of HAPs as defined by 40 CFR 63.41.

326 IAC 5-1-2 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

(a) visible emissions shall not exceed an average of 30% opacity in 24 consecutive readings.

(b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 8-1-6 (New Facilities General Reduction Requirements for VOC)

This source is not subject to 326 IAC 8-1-6 since potential emissions of VOC are less than 25 tons per year. No other 326 IAC 8 rules apply.

326 IAC 8-2-5 (Paper Coating Operations)

This source does not conduct web coating or saturation processes of paper, plastic, metal foil, and pressure sensitive tape, and is not subject to 326 IAC 8-2-5.

326 IAC 8-5-5

This source is not subject to 326 IAC 8-5-5 because it does not conduct packaging rotogravure, publication rotogravure, or flexographic printing, and it's potential emissions for VOC are less than 25 tons per year.

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Nonattainment Area Limitations: Particulate Emission Limitations)

Pursuant to 326 IAC 2 (Permit Review Rules), 326 IAC 2-6.1 (Minor Source Operating Permit Program), and 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), PM emissions are limited to 0.03 gr/dscf. The baghouse controlling emissions for EU2 and EU3 has a capacity of 12,453 dscfm. This equates to 14.02 tons per year of PM (See Appendix A calculations page 4 of 4 at the bottom). The baghouse limits PM emissions to 0.2 tons per year, therefore the source is in compliance as long as the baghouse is in operation.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The 3.348 MMBTU/hr natural gas fired Superior 508 Boiler is subject to 326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating), because they are sources of indirect heating that were constructed after September 21st, 1983. Pursuant to 326 IAC 6-2-4, the particulate matter (PM) emissions shall be limited to 0.6 pounds per million BTU heat input, which is equivalent to 8.79 ton/yr.

Based on this calculation, the potential emissions are less than the allowable emissions, therefore, the equipment complies with the above limitation.

Compliance Requirements

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will

arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) For emission units EU2 and EU3, daily visible emissions notations of the vent off of CE-2 shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary to ensure compliance with 326 IAC 5-1-4.

(b) In order to meet the PM emission limitations established by 326 IAC 6-1-2, the baghouse shall be operated at all times when the scrap collectors are in operation.

(1) The Permittee shall take readings of the total static pressure drop across the baghouse, at least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.5 and 8 inches of water. The Preventive Maintenance Plan for this baghouse shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.

(2) The instrument used for determining the pressure shall be subject to approval by ERMD and shall be calibrated at least once every six (6) months.

(3) The gauge employed to measure the pressure drop across the baghouse or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm$ 2% of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

(4) An inspection shall be performed each calendar quarter of all the baghouses. Defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.

(5) In the event that a bag's failure has been observed:

(A) The affected compartments will be shut down immediately until the failed units have been replaced.

(B) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They

are listed as air toxics on the Office of Air Quality (OAQ) Construction Permit Application Form Y.

None of the listed air toxics will be emitted from this source.

Conclusion

The construction and operation of this stationary manufacturer of corrugated sheets shall be subject to the conditions of the attached proposed Minor Source Operating Permit 097-12706-00347.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10

Company Name:	**Flutes, LLC**
Address City IN Zip:	**8252 Zionsville Road**
MSOP:	**097-12706-00347**
Plt ID:	**347**
Reviewer:	**DRA**
Date:	**08/28/01**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.3	29.3

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	100.0	5.3	84.0
Potential Emission in tons/yr	0.2	0.2	0.0	1.5	0.1	1.2

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 84, Low NOx Burner = 84, Flue gas recirculation = 84

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

gasc10.wk4 9/95

Appendix A: Emission Calculations
Aristrade Line Scrap Collector
MM Btu/hr 0.3 - < 10

Company Name:	**Flutes, LLC**
Address City IN Zip:	**8252 Zionsville Road**
CP:	**097-12706-00347**
Plt ID:	**347**
Reviewer:	**DRA**
Date:	**08/28/01**

Maximum Production Capacity

Paper	15000	lbs/hr
Corn Starch Glue	1672	lbs/hr
Cold Set Glue	384	lbs/hr
Total:	17056	lbs/hr
Allowable Emissions Process Weight	16.5	lbs/hr
	72.27	tons/year

PM Emissions:

Paper Throughput	15000	lbs/hr
% Scrap	8%	
Scrap	1200	lbs/hr
% Less than 10 microns	0.50%	
Potential Emissions	6.00	lbs/hr
PTE in Tons Per Year	26.28	tons/year
PTE PM10	0.2	tons/year
Control Efficiency of Cyclone	85%	
Control Efficiency of Filter	99.97%	
Emissions After Control	0.00027	lbs/hr
	0.001183	tons/year

VOC Emissions:

8.716 Tons per year

Formaldehyde Emissions

0.33 Tons per year

Appendix A: Emission Calculations
Summary of Emissions in Tons Per Year
MM Btu/hr 0.3 - < 10

Company Name:	**Flutes, LLC**
Address City IN Zip:	**8252 Zionsville Road**
CP:	**097-12706-00347**
Plt ID:	**347**
Reviewer:	**DRA**
Date:	**08/28/01**

Potential to Emit	PM	PM10	SO2	NOx	VOC	CO	Formaldehyde
EU1	0.2009	0.2009	0.00879854	1.466424	0.07772	1.231796	
EU2	26.28	0.2			8.716		0.33
EU3	26.28	0.2			8.716		0.33
Total	52.7609	0.6009	0	1.5	17.50972	1.231796	0.66

Previous CP	19	0.2	0	1.5	8.82	0.3	0.34
Difference	33.7609	0.4009	0	0	8.68972	0.931796	0.32

After Controls	PM	PM10	SO2	NOx	VOC	CO	Formaldehyde
EU1	0.2009	0.2009	0.00879854	1.466424	0.07772	1.231796	
EU2	0.001183	0.001183			8.716		0
EU3	0.001183	0.001183			8.716		0
Total	0.203265	0.203265	0	1.5	17.50972	1.231796	0

Particulate Limit Under 326 IAC 6-1-2

dscf/min of control	12453	gr/dscf	lbs/gr
lbs/min	0.05337	0.03	0.0001429
lbs/hr	3.2022		
tons/yr	14.02564		